

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

JOHN DOE

PLAINTIFF

v.

CAUSE NO. 1:20-cv-199-NBB-DAS

**MISSISSIPPI STATE UNIVERSITY,
DR. THOMAS BOURGEOIS,
and JANE ROE**

DEFENDANTS

**DEFENDANTS MISSISSIPPI STATE UNIVERSITY'S AND
DR. THOMAS BOURGEOIS' RESPONSE TO PLAINTIFF'S MOTION
TO PROCEED UNDER PSEUDONYM AND FOR PROTECTIVE ORDER**

Defendants Mississippi State University ("MSU") and Dr. Thomas Bourgeois ("Bourgeois") file their Response to Plaintiff John Doe's ("Doe") Motion to Proceed Under Pseudonym and for Protective Order [dkt. #3] as follows:

1. MSU and Bourgeois deny all allegations set forth against them in Doe's Motion to Proceed Under Pseudonym and for Protective Order. MSU and Bourgeois, however, do not oppose Doe's request to proceed in this action anonymously.
2. Doe further requests a protective order, and he states that such an order is attached to his motion as Exhibit A. However, the only order attached to the motion as an exhibit is the proposed order granting Doe's request to proceed under the pseudonym of "John Doe." *See* Mtn. to Proceed Under Pseudonym and for Protective Order at Ex. 1, Proposed Order [dkt. #3-1].
3. To the extent Doe requests any further protective order from the Court, MSU and Bourgeois cannot state their opposition or agreement to any such order without knowledge of the specific protections Doe seeks. In the event Doe is actually seeking an

additional order of protection, MSU and Bourgeois request that Doe be required to provide additional information regarding the same.

4. In conclusion, however, MSU and Bourgeois do not oppose the use of pseudonyms to protect the individuals denominated herein as John Doe, Jane Doe, and they further request that these same protections be extended to other current or former MSU students who may be discussed in filings in this action.

Dated: November 12, 2020

Respectfully Submitted,

MISSISSIPPI STATE UNIVERSITY
and DR. THOMAS BOURGEOIS

/s/ Charles E. Winfield

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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Dated: November 12, 2020

/s/ Charles E. Winfield
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